

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

<b>JOZEF TRACZYK,</b>	)	<b>Plaintiff Demands</b>
	)	<b>Trial by Jury</b>
Plaintiff,	)	
	)	Case No. 18-cv-478
vs.	)	
	)	Judge
<b>MAURA BIELINSKI,</b>	)	
	)	Magistrate
Defendant.	)	

**COMPLAINT AT LAW**

Now comes the Plaintiff, **JOZEF TRACZYK**, by and through his attorneys, **FAKLIS, TALLIS & MEAD, P.C.** and complaining of the Defendant, **MAURA BIELINSKI**, Plaintiff states as follows:

1. This is a civil action seeking damages against the Defendant, **MAURA BIELINSKI**, for personal injuries. The Court has jurisdiction of this action under *28 United States Code Section 1332*.
2. The Plaintiff, **JOZEF TRACZYK**, is a citizen of State of Illinois.
3. The Defendant, **MAURA BIELINSKI**, is a citizen of State of Wisconsin.
4. The matter in controversy exceeds, exclusive of interest and costs, the sum of Seventy Five Thousand Dollars (\$75,000.00).
5. That on June 16, 2016, Highway KF was a public highway running in a general northerly and southerly direction and Lindsay Road was a public road running in a general easterly and westerly direction at Highway KF, in the City of Pewaukee, County of Waukesha, and State of Wisconsin.

6. That on June 16, 2016, the Defendant, **MAURA BIELINSKI**, operated, managed, maintained and controlled a motor vehicle in a westerly direction on Lindsay Road at Highway KF, in the City of Pewaukee, County of Waukesha, and State of Wisconsin.

7. That on June 16, 2016, the Plaintiff, **JOZEF TRACZYK**, was a passenger in a motor vehicle being operated by Jaroslaw Wojciak, in a northerly direction on Highway KF, in the City of Pewaukee, County of Waukesha, and State of Wisconsin.

8. That on June 16, 2016, the Defendant, **MAURA BIELINSKI**, owed the Plaintiff, **JOZEF TRACZYK**, a duty to exercise ordinary care while operating a motor vehicle.

9. That on June 16, 2016, the motor vehicle being operated by the Defendant, **MAURA BIELINSKI**, traveled into the northbound travel lane of Highway KF and collided with the vehicle being driven by Jaroslaw Wojciak, in which the Plaintiff, **JOZEF TRACZYK**, was a passenger.

10. That on June 16, 2016, the Defendant, **MAURA BIELINSKI**, was then and there guilty of one or more of the following negligent acts or omissions:

- a) Operated a motor vehicle without keeping a proper and sufficient lookout;
- b) Failed to stop in obedience to a stop sign; and
- c) Entered a through highway without yielding the right of way to a vehicle, which had entered the intersection or which was approaching so closely on said highway as to constitute an immediate hazard.

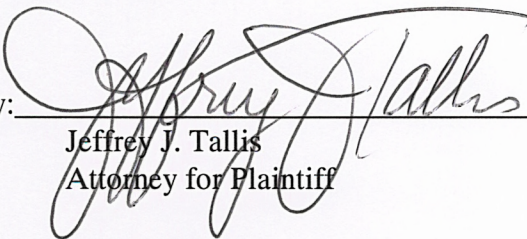
11. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions of the Defendant, **MAURA BIELINSKI**, the Plaintiff, **JOZEF TRACZYK**, sustained injuries; has lost and will lose in the future financial gains which he otherwise would have made and

acquired; has been and will be kept from attending to his ordinary affairs; and has become liable for large sums of money for medical hospital care and attention.

12. The Plaintiff, **JOZEF TRACZYK**, demands trial by a jury.

**WHEREFORE**, Plaintiff, **JOZEF TRACZYK**, asks for judgment against the Defendant, **MAURA BIELINSKI**, in a sum in excess of Seventy Five Thousand Dollars (\$75,000.00) exclusive of interests and costs.

Respectfully submitted,

By:   
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Attorney for Plaintiff

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